

EXHIBIT 7

WILLIAM MICHAEL PIATT - 2/4/2020

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION</p> <p>HARRIET LANE, *</p> <p style="text-align: center;">Plaintiff, *</p> <p>v. * C.A. No. 4:19-cv-00435</p> <p style="text-align: center;">SIEMENS ENERGY, INC., * JURY TRIAL DEMANDED</p> <p style="text-align: center;">Defendant. *</p> <p>*****</p> <p style="text-align: center;">ORAL DEPOSITION OF WILLIAM MICHAEL PIATT FEBRUARY 4, 2020</p> <p>*****</p> <p>ORAL DEPOSITION of WILLIAM MICHAEL PIATT, produced as a witness at the instance of the Plaintiff, and duly sworn, was taken in the above-styled and numbered cause on February 4, 2020, from 12:39 p.m. to 1:49 p.m. before Constance Koenig, RMR and CSR No. 6577 in and for the State of Texas, reported by stenographic method at Baker & Hostetler, LLP, 811 Main Street, Suite 1100 Houston, Texas 77002, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record attached hereto.</p>	<p style="text-align: right;">Page 3</p> <p style="text-align: center;">I N D E X</p> <p>Appearances 2</p> <p>WILLIAM MICHAEL PIATT</p> <p>Examination by Mr. Bail 4</p> <p>Examination by Ms. Grant 45</p> <p>Changes and Signature 46</p> <p>Reporter's Certificate 48</p> <p style="text-align: center;">E X H I B I T S</p> <p>Exhibit 1 Defendant Siemens Energy Inc.'s Supplemental Objections and Answers to Plaintiff's First Set of Interrogatories (NO BATES NUMBERS) 14</p> <p>Exhibit 2 Record and Notes of Bill Piatt (SIEMENS-LANE_00326) 21</p> <p>Exhibit 3 Chain of Emails with Attachments, Subject: FW: Business Justification (SIEMENS-LANE_00841-844) 30</p> <p>Exhibit 4 Internal Auditing Role and Responsibilities (SIEMENS-LANE_00206-207) 34</p>
<p style="text-align: right;">Page 2</p> <p style="text-align: center;">A P P E A R A N C E S:</p> <p>FOR THE PLAINTIFF:</p> <p>Mr. Ashok Bail</p> <p>THE BAIL LAW FIRM, PLLC</p> <p>3120 Southwest Freeway, Suite 450</p> <p>Houston, Texas 77098</p> <p>832.216.6693</p> <p>ashok@baillawfirm.com</p> <p>FOR THE DEFENDANT:</p> <p>Ms. Ashlee Grant</p> <p>BAKER & HOSTETLER LLP</p> <p>811 Main Street, Suite 1100</p> <p>Houston, Texas 77002</p> <p>713.646.1316</p> <p>agrant@bakerlaw.com</p>	<p style="text-align: right;">Page 4</p> <p>WILLIAM MICHAEL PIATT,</p> <p>having been first duly sworn, testified as follows:</p> <p style="text-align: center;">E X A M I N A T I O N</p> <p>BY MR. BAIL:</p> <p>Q. Can you please state your full name and spell it out for the Court, please?</p> <p>A. William Michael Piatt, W-I-L-L-I-A-M, M-I-C-H-A-E-L, P-I-A-T-T.</p> <p>Q. Mr. Piatt, do you also go by "Bill"?</p> <p>A. I do.</p> <p>Q. Can I call you "Bill"?</p> <p>A. Yes, you may.</p> <p>Q. Thank you.</p> <p>For the record, do you classify yourself as a Caucasian male?</p> <p>A. I do.</p> <p>Q. Have you ever had your deposition taken before?</p> <p>A. I have.</p> <p>Q. How long ago was that?</p> <p>A. Maybe a year and a half.</p> <p>Q. Okay. Was it in relation to an employment matter?</p> <p>A. No.</p> <p>Q. I'm going to go over a couple of guidelines you have probably heard before and she has probably gone</p>

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<p>1 over with you already, but I'm going to do it again.</p> <p>2 One of the rules for us to abide by is for</p> <p>3 me to ask you a question and for you wait to wait for me</p> <p>4 to finish my question before responding. And, likewise,</p> <p>5 I will wait for you -- try my best to wait for you to</p> <p>6 finish your response before I ask a question. Okay?</p> <p>7 A. Okay.</p> <p>8 Q. Another thing to keep in mind is when you are</p> <p>9 responding -- and you are already doing a good job of</p> <p>10 it -- is to have oral responses as opposed to nodding of</p> <p>11 the head or shaking of the head and things of that</p> <p>12 nature, because she can't pick it up.</p> <p>13 A. Okay.</p> <p>14 Q. If there is a question you don't understand,</p> <p>15 please ask me to rephrase the question and I will until</p> <p>16 you understand it.</p> <p>17 A. Okay.</p> <p>18 Q. If you need a break, let me know. I don't</p> <p>19 think this is going to take too long, maybe an hour,</p> <p>20 hour and a half. Still, if you need a break during that</p> <p>21 period of time, just let me know.</p> <p>22 A. Okay.</p> <p>23 Q. Bill, could you please tell the Court your</p> <p>24 educational background from college, just college-wise?</p> <p>25 A. No college.</p>	<p>1 A. And, again, this is the best of my recollection</p> <p>2 without any record in front of me.</p> <p>3 Q. Understood.</p> <p>4 You know who my client Harriet Lane is,</p> <p>5 correct?</p> <p>6 A. I do.</p> <p>7 Q. You used to work with her when she was working</p> <p>8 at Siemens?</p> <p>9 A. I did.</p> <p>10 Q. Were you ever her supervisor?</p> <p>11 A. I was not.</p> <p>12 Q. When you became the Quality manager, who did</p> <p>13 you manage?</p> <p>14 A. Dennis Pluskota.</p> <p>15 Q. Can you spell his last name?</p> <p>16 A. I'll try. P-L-U-S-K-O-T-A.</p> <p>17 Q. Okay.</p> <p>18 A. Andrew Loera, L-O-E-R-A; Frank Gutierrez, I</p> <p>19 won't try; Todd Adams; Sylvia Nadal; Marlon Vaughn. Had</p> <p>20 a couple temporary people. One of them I know was David</p> <p>21 Moltamoyal [phonetic], and now I also have a Chris</p> <p>22 Guidry.</p> <p>23 Q. And the individuals that you just listed, are</p> <p>24 they all the individuals, to your knowledge, that you</p> <p>25 have supervised since you have been a Quality manager?</p>
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<p>1 Q. Okay. Can you please -- strike that.</p> <p>2 How long have you worked for Siemens?</p> <p>3 A. Almost 19 years.</p> <p>4 Q. Did you ever work for Rolls-Royce?</p> <p>5 A. I did not.</p> <p>6 Q. In the 19 years that you've been working for</p> <p>7 Siemens, can you chronologically tell me what your</p> <p>8 positions within the company have been?</p> <p>9 A. Yes. I was hired on as an inspector. I worked</p> <p>10 on the shop floor. I then was a surveillance inspector</p> <p>11 working at vendor sites. I then became the inspection</p> <p>12 coordinator, then the Quality Assurance manager, and</p> <p>13 then the Quality manager.</p> <p>14 Q. Okay. When were you the inspection coordinator?</p> <p>15 A. Without my record in front of me, I'll have to</p> <p>16 guess for you.</p> <p>17 Q. Please guess.</p> <p>18 A. About nine years back.</p> <p>19 Q. Okay. And about nine years ago -- strike that.</p> <p>20 When did you become a quality assurance</p> <p>21 manager?</p> <p>22 A. About seven years ago.</p> <p>23 Q. And when did you become the Quality manager?</p> <p>24 A. Four, five years ago.</p> <p>25 Q. So --</p>	<p>1 A. I believe that's all of them.</p> <p>2 Q. Okay. Of all the individuals you listed, there</p> <p>3 is only one female, Sylvia Nadal; is that correct?</p> <p>4 A. This is correct.</p> <p>5 Q. You still supervise Sylvia Nadal?</p> <p>6 A. I do.</p> <p>7 Q. What position does she hold?</p> <p>8 A. She is inspection coordinator/document control.</p> <p>9 Q. When you became the Quality manager, did you</p> <p>10 have to apply for that position?</p> <p>11 A. Yes. It was offered and I applied.</p> <p>12 Q. Was it something that was announced internally</p> <p>13 within Siemens?</p> <p>14 A. The position?</p> <p>15 Q. Uh-huh.</p> <p>16 A. I do not know for sure.</p> <p>17 Q. How did you become aware of the position?</p> <p>18 A. My boss retired or left.</p> <p>19 Q. Who was your boss?</p> <p>20 A. Give me a second. Hector Torres.</p> <p>21 Q. How would you describe your relationship</p> <p>22 working with Hector Torres?</p> <p>23 A. Good.</p> <p>24 Q. In 2017 can you explain like the divisions you</p> <p>25 were working with and the ones you were working under?</p>

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<p>1 A. I'm not sure what you mean by "divisions." 2 Q. So you are Quality manager, correct? 3 A. Correct. 4 Q. So is Quality a department or a division? 5 A. Department. 6 Q. A department, okay. 7 How many other supervisors -- strike that. 8 How many other managers were in the 9 Quality department besides you? 10 A. None. 11 Q. I'm going to read out the names that I 12 just -- that you just testified to, and could you please 13 let me know which ones you were supervising in 2017 14 after Harriet came back from her leave? 15 Were you supervising Andrew Loera? 16 A. Yes. 17 Q. Were you supervising Frank Gutierrez? 18 A. Yes. 19 Q. Were you supervising Todd Adams? 20 A. I don't recall if he had left or not yet. 21 Possibly. 22 Q. Possibly. Okay. 23 What about Pluskota? 24 A. Yes. 25 Q. Sylvia?</p>	<p>1 Q. Okay. He took resignation in lieu of 2 termination? 3 A. I believe so. I would have to see the records 4 to know for sure. 5 Q. Other than the people that you supervised, were 6 there any other employees of Siemens that you were 7 involved in their termination action? 8 MS. GRANT: Objection; form. 9 A. Yes. 10 Q. (BY MR. BAIL) Who was that? 11 A. Another person that actually I supervised that 12 I left off that list. And I can't remember the 13 gentleman's name. It was a long time back. 14 Q. Okay. 15 A. I could give you the information, if it's 16 needed. 17 Q. I appreciate that. 18 You recall there was a time period when 19 Harriet was working here that she took off two or three 20 months' leave? Do you recall that? 21 A. I recall. 22 Q. Do you recall that being an FMLA leave? 23 A. I do. 24 Q. How did you know that? 25 A. I was told by her manager.</p>
Page 10	Page 12
<p>1 A. Yes. 2 Q. Marlon Vaughn? 3 A. Yes. 4 Q. David whatever? 5 A. No. He was not there at the time. 6 Q. And Chris? 7 A. No. 8 Q. Of the individuals that I have listed, have you 9 been involved with the termination of any of them? 10 A. Yes. 11 Q. Which one? 12 A. Todd Adams and Andrew Laura. 13 Q. Do you recall when Todd Adams was terminated? 14 A. I don't know the date. It was several years 15 ago. 16 Q. Several years ago. 17 What about Loera? 18 A. He was probably about a year and a half ago. 19 He went to a competitor. 20 Q. Okay. So he wasn't terminated; he chose to 21 leave? 22 A. Correct. 23 Q. So the only person that you were involved with 24 their termination is Todd Adams? 25 A. I believe he chose to resign.</p>	<p>1 Q. Who was her manager at that time? 2 A. Bear with me. We go through managers. 3 Q. Was that Melissa King? 4 A. Yes, thank you. 5 Q. And during that time period when my client was 6 on leave, did you assume any of her duties? 7 A. Yes. 8 Q. Can you tell me which ones you assumed? 9 A. May I rephrase? The audit team assumed some of 10 her duties. 11 Q. Okay. How does the audit team relate 12 to -- what is its relation to the Quality department? 13 A. The Quality department is responsible for your 14 Integrated Management System. Internal auditing is part 15 of the Integrated Management System. 16 Q. Okay. So you being the Quality manager, would 17 you be supervising people on the audit team? 18 A. I don't know if I would say "supervising," but 19 working with. 20 Q. Do you recall who was on the audit team at that 21 time period? 22 A. Ms. Lane, myself, Melissa -- and I can't get 23 her name -- Stozavik. 24 Q. I know who you are talking about. 25 A. And Andrew Loera was all on the team.</p>

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1 Q. Do you know what duties Melissa assumed of
 2 Harriet's during that time period?
 3 A. We divided up what audits Harriet was scheduled
 4 to do amongst the team. I don't recall who took what
 5 audits.
 6 Q. Okay. Did y'all try to divide the audits up
 7 equally?
 8 A. I believe that was the plan. Again, I'd have
 9 to look at the records, but more or less.
 10 Q. Okay. Besides auditing, what other job
 11 functions of Harriet's, if any, did you or any of the
 12 other members of the audit team assume?
 13 A. None.
 14 Q. Only the audit duties?
 15 A. Yes.
 16 Q. Okay. To your knowledge?
 17 A. Yes.
 18 Q. And when Harriet returned from leave, do you
 19 remember any changes in her role?
 20 A. No. I know she took back over audit as lead on
 21 the audit team.
 22 Q. What does it mean to be a lead auditor?
 23 A. The roles were to keep the database up to date,
 24 to help others, if needed, on the audit team. I think
 25 preparing the yearly audit plan. That's what the lead

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1 A. You want me to read all this legal?
 2 Q. You can -- it's up to your attorney about how
 3 you want to treat that document. I just want to ask you
 4 questions from it.
 5 MS. GRANT: You don't need to read all of
 6 the legal.
 7 Q. (BY MR. BAIL) I'll tell you what, I'm going to
 8 ask you questions from Interrogatory No. 5, No. --
 9 A. Thank you. That's helpful.
 10 Q. -- Nos. 11 and 12. 5, 11 and 12. So whenever
 11 you have reviewed those, let me know.
 12 MS. GRANT: While he's reading that, can
 13 we stipulate to read and sign?
 14 Q. (BY MR. BAIL) What number are you looking at
 15 right now?
 16 A. On page 13.
 17 Q. You don't have to read that one for this one.
 18 You want to go to page 15, Nos. 11 and 12.
 19 MS. GRANT: He's only going to ask you
 20 about three of them, these two.
 21 A. Okay.
 22 Q. (BY MR. BAIL) If you could please turn to
 23 page 7.
 24 A. Okay.
 25 Q. Have you ever seen this document before you or

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1 did.
 2 Q. Okay. Were you ever aware at any time during
 3 my client's employment with Siemens that she was
 4 classified as a senior business process specialist?
 5 A. I'm not sure what her titles were.
 6 Q. Okay. It's fair to say, you know what you saw
 7 her do?
 8 A. Correct.
 9 Q. You didn't know particularly what she was
 10 called?
 11 A. Correct.
 12 Q. Okay. You saw her doing auditing. She could
 13 have been doing other things that you weren't aware of,
 14 right --
 15 A. Yes.
 16 Q. -- as a senior business process specialist?
 17 A. Correct.
 18 Q. I'm going to hand you some documents. You may
 19 have reviewed them; you may have seen them. I'm going
 20 to ask you some questions from them. Please take a look
 21 at these.
 22 (Exhibit 1 was marked.)
 23 Q. (BY MR. BAIL) Please take a few minutes to
 24 review this, and let me know when you are comfortable
 25 discussing it.

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1 a similar document in this case?
 2 A. No.
 3 Q. Have you ever been asked to respond to any of
 4 the -- strike that.
 5 Do you know what interrogatory questions
 6 are?
 7 A. Not really.
 8 Q. Okay.
 9 MR. BAIL: For the record, in front of the
 10 witness is Defendant Siemens Energy's Supplemental
 11 Objections and Answers to Plaintiff's First Set of
 12 Interrogatories.
 13 If you go to the bottom of page 7, the
 14 last paragraph, see where it says, "By October 2016 upon
 15 the completion of a larger organizational restructuring,
 16 the Business Excellence department was eliminated."
 17 Do you see that?
 18 A. I do.
 19 Q. Do you know what that's all about?
 20 MS. GRANT: Objection; form.
 21 A. I know that we had a reduction in workforce due
 22 to lack of work around 2016.
 23 Q. (BY MR. BAIL) Was the Business Excellence
 24 department under the Quality department?
 25 A. It was the Quality department.

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<p style="text-align: right;">Page 17</p> <p>1 Q. Okay. So was there even a Quality department 2 before this changed? 3 A. At one point in time there was a Quality 4 department. At one point in time there was a Business 5 Excellence. At one point in time there was both. I 6 mean, organizational restructuring. 7 Q. Okay. So as of October 2016, it was called the 8 Quality department? 9 A. I believe that to be the case. 10 Q. And you were the manager of the Quality 11 department at that time? 12 A. I believe at that time Hector Torres was still 13 the manager of the Business Excellence department and 14 the name changed, takes some time. I don't have the 15 dates in front of me. So I can't say. 16 Q. Were you the manager of the Quality department 17 before Harriet went on her leave? 18 A. Yes. 19 Q. And was that a pretty new position for you at 20 that time? 21 A. I was a Quality assurance manager prior to that 22 and then the Quality manager, if you will, and I don't 23 know the length of time. Again, I'd have to have this 24 timeline in front of me to fully answer. 25 Q. How many individuals that you have supervised</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. Okay. In your role as a Quality manager, have 2 you hired any new employees? 3 A. Yes. 4 Q. Were they the same individuals you just 5 testified to? 6 A. Yes, the three. 7 Q. If you turn to page 8 of the document that's in 8 front of you and go towards the middle, you see my 9 document? I'm going to be asking questions right there. 10 See where it says, "From February 13, 11 2017, through May 21, 2017, while Plaintiff was out on 12 FMLA leave, Bill Piatt, Quality manager, assumed 13 Plaintiff's duties and responsibilities." 14 Do you see that? 15 A. I do. 16 Q. Okay. You testified earlier that you assumed 17 her duties and responsibilities, but others in the 18 auditing department also did? 19 A. I believe I was saying the audit team took on 20 the responsibilities of her internal audits that she was 21 going to do. 22 Q. Now, the next line, it says, "On May 25, 2017, 23 upon Plaintiff's return from leave" -- and the Plaintiff 24 we're talking about is Harriet Lane -- "Piatt and Donna 25 Wilson decided that Plaintiff's prior IMS system</p>
<p style="text-align: right;">Page 18</p> <p>1 have you had any role in their hiring? 2 A. Three or four. 3 Q. Of those three or four, were all three or four 4 of those individuals selected for permanent positions 5 within the company? 6 A. Yes. 7 Q. Were you involved with interviews for all of 8 those positions? 9 A. Yes. 10 Q. Could you name the individuals that you are 11 referring to? 12 A. David Moltamoyal [phoentic], Chris Guidry, 13 Marlon Vaughn, and I had some interaction on those lines 14 for Andrew Loera, but that was before I was a manager. 15 Q. So you were in some role or fashion involved 16 with hiring those individuals, correct? 17 A. Andrew, an interview only; the other three, 18 yes. 19 Q. Okay. Do you know -- were you ever on an 20 interview panel where you were interviewing applicants 21 for positions? 22 A. Yes. 23 Q. And on those interview panels for the positions 24 you just testified to, were there female applicants? 25 A. I don't recall.</p>	<p style="text-align: right;">Page 20</p> <p>1 responsibilities would remain under Piatt's purview and 2 Plaintiff's responsibilities would be limited to her job 3 duties and responsibilities would be limited to those 4 Lead Internal Auditor duties and responsibilities." 5 Do you recall this May 25, 2017 -- 6 A. I recall the meeting, but I do not recall what 7 you have just read. 8 Q. Okay. 9 A. What I recall was Ms. Lane asked to stop doing 10 the IMS procedures. When you are saying IMS system, the 11 role is IMS documents in and out of our repository, the 12 updating of those, the assisting and writing, things of 13 that nature. And I recall that it was her that asked to 14 no longer do those duties. 15 Q. And those were given to Irene? Those duties? 16 A. Just the part of the database, the in and out 17 of documents. 18 Q. Okay. Is there anything else you can recall 19 from that May 25, 2017, meeting with you, Donna Wilson 20 and my client? 21 A. I recall there was a lot of requests from 22 Ms. Lane. There was also decisions made with her 23 manager Donna, and there is a report and then there was 24 a lot of things asked of myself to do, which I recall 25 complying to to close out those meeting notes. I don't</p>

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<p>1 know what they exactly are. If you pull the sheet up, 2 we can talk about it further. 3 Q. Speaking of which, prior to your testimony 4 today, did you review any documents? 5 A. I met with my lawyer, or Siemens' lawyer, and 6 we looked at a few documents. 7 Q. Do you recall what documents you reviewed? 8 A. The one I'm speaking of. 9 Q. This one that you are looking at? 10 A. No. The one of the meeting minutes. 11 Q. Okay. Anything else? 12 A. An email that I have that I gave to HR. 13 Q. Okay. What was the contents of that email? 14 A. Some comments that I had made to HR. 15 Q. Did it look like this? 16 A. That would be the one. 17 Q. Anything else? 18 A. Not that I recall. 19 Q. Okay. Let's go ahead and talk about this. 20 (Exhibit 2 was marked.) 21 Q. (BY MR. BAIL) Please take a look at this. And 22 if you want to review it again, please review it. 23 A. Yes. 24 Q. Okay. Could you please tell the Court what 25 this document in front of you is?</p>	<p>1 A. Either Melissa or HR, or this was actually the 2 meeting when Ms. Lane, myself, HR and some other person 3 on the phone sat down and discussed this matter. 4 Q. Would it have been Linda Hubbard from HR? 5 A. It would have been Linda Hubbard. 6 Q. Because Toni Horton wasn't there at that time? 7 A. She wasn't there. 8 Q. The next bullet point, "In June 2017 Harriet 9 told her manager, Donna Wilson, that I was harassing 10 her. I have no details of what I was supposed to have 11 done, but it was also unfounded." 12 Who told you about what happened 13 June 2017? 14 A. I believe it was Donna. 15 Q. Then you have "July 21, 2017, Harriet made 16 accusations about me to HR. I was harassing her or 17 something, because I have made changes to how and what 18 we audit." 19 Who told you about that? 20 A. I believe that would be Donna again. I 21 believe. I'm not positive. 22 Q. Okay. So June 2017, July 2017 are both dates 23 that were after Harriet came back from her FMLA leave, 24 correct? 25 A. I believe. I guess.</p>
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<p>1 A. It was a record that I chose to keep over this 2 time period. 3 Q. Okay. You have an entry here for September 13, 4 2016. Do you see that? 5 A. Yes, I do. 6 Q. When did you write that? 7 A. That week or that date. I don't know exactly, 8 but I'm sure it's right around that date. 9 Q. Did you write it in handwriting and then copied 10 it and typed it up, or did you type it into a computer? 11 A. Pretty sure it was just typed. 12 Q. Then you also have the paragraph here about 13 what you alleged happened on July 25, 2017, correct? 14 A. Correct. 15 Q. Okay. If you could focus your attention on the 16 bullet points in the middle of it. 17 A. Yes. 18 Q. So the first bullet point, it says, "Harriet 19 met with HR and Melissa King just prior to her FMLA 20 leave and stated that I was harassing her. She produced 21 two emails as evidence that was unfounded." 22 Do you see that? 23 A. I do. 24 Q. Who told you that she was complaining about you 25 harassing her?</p>	<p>1 Q. You wouldn't know the specifics. 2 Do you recall if Donna Wilson said -- 3 strike that. 4 Did Donna Wilson ever tell you that 5 Harriet thinks that you are treating her negatively or 6 harassing her because of her race or gender? 7 A. No. 8 Q. Okay. But you knew that there was some 9 complaints that she made during those time periods? 10 A. Correct. 11 Q. Okay. Let's go to this July 25, 2017, 12 paragraph. Let's go to the last line. It says, "I fear 13 that this is a race or gender issue. She seemed to have 14 no issue prior to her previous managers leaving the 15 company, Ayana Brown, Black female, and Hector Torres, 16 Hispanic male." 17 So explain what you meant by that. 18 A. Well, I will explain the whole paragraph. 19 Q. Go ahead. 20 A. I wrote the paragraph, as you see, after the 21 June, July incidents where I was notified. I personally 22 felt that I was being attacked. I felt it was 23 harassment. I felt that it was racial. I felt that it 24 was gender. I took this, wrote it down so I would have 25 my thoughts of how I felt and perceived the situation.</p>

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<p>1 I took it to HR. I presented it to them, and I asked to</p> <p>2 have a case opened, which they denied to do.</p> <p>3 Q. They denied it?</p> <p>4 A. This is why it is written down, because this is</p> <p>5 how I felt that day after that had taken place. I felt</p> <p>6 I was being attacked and unwarrantedly and that Ms. Lane</p> <p>7 was after my job, wanted me fired. I don't know what it</p> <p>8 was. But I felt this way, so it's written down for</p> <p>9 evidence.</p> <p>10 Q. But you know at that time Ms. Lane felt you</p> <p>11 were harassing her, correct?</p> <p>12 A. From the several notices, yes.</p> <p>13 Q. And one of the points here on July 31 it says</p> <p>14 something about you making changes with audits.</p> <p>15 What is that all about? How are they</p> <p>16 done?</p> <p>17 A. I wanted things done differently. Might have</p> <p>18 been a different report form. I'm not sure exactly what</p> <p>19 the changes were, but yes, there were things that we</p> <p>20 were trying to improve.</p> <p>21 Internal auditing is about the process</p> <p>22 owner and helping that process owner do a better job.</p> <p>23 So there were changes that I felt needed to be made</p> <p>24 through feedback from the process owners. So those</p> <p>25 changes I wanted implemented at the request of the</p>	<p>1 auditors to do audit a certain way, but that certain way</p> <p>2 was not approved by your upper management?</p> <p>3 MS. GRANT: Objection; form.</p> <p>4 A. Can you rephrase? I'm not sure how I'm going</p> <p>5 to answer that.</p> <p>6 Q. Yes. You just testified that in order for a</p> <p>7 change to be implemented, it had to be approved by</p> <p>8 upper-level management, right?</p> <p>9 A. Other managers.</p> <p>10 Q. So the changes that you were wanting to make</p> <p>11 during this time period regarding audits were never</p> <p>12 approved by other managers, correct?</p> <p>13 A. I do not believe they were sent to me to be</p> <p>14 approved, correct.</p> <p>15 Q. Why were they not sent?</p> <p>16 A. I don't recall.</p> <p>17 Q. You just explained how -- explain the process</p> <p>18 by and which you would want a certain procedure changed.</p> <p>19 What would you do?</p> <p>20 A. Write the procedure and then the parties that</p> <p>21 are involved are responsible for making changes, would</p> <p>22 be sent to those for review, comments, agreements made</p> <p>23 and then changes made or not changed.</p> <p>24 Q. And you don't recall doing that for the audit</p> <p>25 changes that you wanted?</p>
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<p>1 process owners.</p> <p>2 Q. Did you have any power over my client at that</p> <p>3 point in terms of management to make sure, -- strike</p> <p>4 that. Too many words.</p> <p>5 Was Harriet apprehensive to the changes</p> <p>6 that you were making?</p> <p>7 A. I'm not sure. I believe so, but so were some</p> <p>8 of the other auditors. It was brought up in a meeting</p> <p>9 and it was more of, This is what I'd like to do. Audit</p> <p>10 team, what shall we do?</p> <p>11 Q. Okay. Did you have the power to tell anybody,</p> <p>12 Hey, this is how we're doing it. Do it?</p> <p>13 A. No.</p> <p>14 Q. Okay.</p> <p>15 A. It would have been a procedural change that</p> <p>16 would have put that into play.</p> <p>17 Q. When you say "procedural change," would you</p> <p>18 have to get it okayed by higher-ups, something like</p> <p>19 that?</p> <p>20 A. Others would have to sign off on the audit</p> <p>21 procedure.</p> <p>22 Q. Was that ever done with the changes that you</p> <p>23 were recommending?</p> <p>24 A. I don't believe they were.</p> <p>25 Q. So you were wanting my client and other</p>	<p>1 A. I don't believe we changed the process. I</p> <p>2 believe these changes -- I'm trying to remember. This</p> <p>3 was a while back.</p> <p>4 Q. Sure.</p> <p>5 A. I think this was more about how to report and</p> <p>6 the forms to use and the goals of an audit versus how we</p> <p>7 were practicing our auditing at the time.</p> <p>8 Q. Okay.</p> <p>9 A. And may not have required procedural change.</p> <p>10 I'm not positive what all the details were.</p> <p>11 Q. Let's go back to the first exhibit, Exhibit 1.</p> <p>12 If you could flip to page 15, and if you could go down</p> <p>13 to Interrogatory No. 11. Let me know when you are</p> <p>14 there.</p> <p>15 A. Okay.</p> <p>16 Q. Interrogatory No. 11, the answer is, "Donna</p> <p>17 Wilson and Bill Piatt made the decision to eliminate</p> <p>18 Plaintiff's position and to terminate Plaintiff's</p> <p>19 employment as part of a reduction in force after they</p> <p>20 were instructed to reduce the head count in the Quality</p> <p>21 department."</p> <p>22 Okay. Let's take this part by part. Is</p> <p>23 it true that yourself and Donna Wilson made the decision</p> <p>24 to eliminate Plaintiff's position?</p> <p>25 A. No.</p>

7 (Pages 25 to 28)

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1 Q. Can you explain your version of the facts?
 2 A. I have no decision-making in Ms. Lane's
 3 employment or nonemployment. That was her manager and
 4 others, I presume. But I had no decision-making
 5 ability.
 6 Q. What input did you have, if any?
 7 A. The same input I guess I had with my team.
 8 This would be the second round of layoffs. We were
 9 asked to look at our department, to look at -- I was
 10 asked to look at the role of auditing, what it takes to
 11 do auditing, put together this is the time it takes to
 12 do audits, this is what I would expect to see, the hours
 13 to take to do the job.
 14 I did a similar thing for all the reports
 15 that I had and presented that to my boss. And then what
 16 they did with that information was up to that team that
 17 was making these decisions.
 18 Q. Did Donna Wilson ever discuss Harriet
 19 specifically with you?
 20 A. No.
 21 Q. Never?
 22 A. Well, sorry. About what?
 23 Q. About other than her -- strike that.
 24 Did she ever express her opinion about
 25 Harriet to you?

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1 MS. GRANT: Objection; form.
 2 A. Again, about what?
 3 Q. (BY MR. BAIL) About Harriet, about her
 4 personality or --
 5 A. No, her personality.
 6 Q. What about her work qualities?
 7 A. I didn't have that much interaction with her
 8 managers about what she did. I have to go with I don't
 9 believe so.
 10 Q. Okay.
 11 (Exhibit 3 was marked.)
 12 Q. (BY MR. BAIL) Take a look at that one and let
 13 me know when you are finished.
 14 A. Okay.
 15 Q. I just wanted to go back to the other one real
 16 quick. I didn't finish Interrogatory No. 11, the second
 17 part. It says -- let me know when you are there.
 18 A. Okay.
 19 Q. Were you ever instructed to reduce the head
 20 count in the Quality department?
 21 A. I was instructed to look at the Quality
 22 department, look at the workload and report back to my
 23 boss whether we were utilized or underutilized.
 24 Q. Do you recall when you were asked to do that?
 25 A. No. Probably several months or a month before

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1 the actual layoff, the second layoff took place,
 2 whenever that was.
 3 Q. Okay. Was my client part of the second layoff?
 4 A. Yes.
 5 Q. Okay. So a couple of months before she was
 6 terminated but after she came back from her leave?
 7 A. I'm assuming. I do not know the dates. If you
 8 show me all the dates, the timelines, I can confirm, but
 9 I don't know the actual dates.
 10 Q. Neither do I. That's why I'm asking you.
 11 A. I'm sorry; I don't know the dates.
 12 Q. All right. But you do recall being told to
 13 reduce the head count in the Quality department?
 14 A. No. I recall being told to look at the head
 15 count in the Quality department and show what
 16 everybody's doing, does that meet -- I'm not sure how to
 17 describe this.
 18 To look at the roles, the duties and the
 19 responsibilities of the Quality department and here's
 20 the workload that we have and here's the forecast, and
 21 then report that back to my manager for a decision to be
 22 made if I need to reduce or not.
 23 Q. Did your managers ask you for your opinion on
 24 your work product? Right now you discussed making
 25 changes to the audit -- strike that.

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1 I think I have exactly what you were
 2 talking about.
 3 Did you prepare this document?
 4 A. Yes, I did.
 5 Q. Can you please identify that document for the
 6 record?
 7 A. "Internal Audit" is the title.
 8 Q. Okay. Is that what you are referring to, what
 9 you prepared?
 10 A. This was for internal auditing only. There was
 11 other assessments done of my team of the Quality
 12 department.
 13 Q. Okay. Was my client part of the Quality
 14 department at that time?
 15 A. No.
 16 Q. That document you just looked at --
 17 MS. GRANT: Are we going to introduce that
 18 into the record?
 19 MR. BAIL: Yes, we are. I'm jumping all
 20 over the place. I'll get to that one.
 21 Q. (BY MR. BAIL) Let's go back to page 15 of
 22 Exhibit No. 1. If you look at Defendant's response to
 23 Interrogatory No. 12, it says, "After they were
 24 instructed to reduce the head count in the Quality
 25 department, Donna Wilson and Bill Piatt made the

8 (Pages 29 to 32)

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1 decision to eliminate Plaintiff's stand-alone position
2 of Lead Internal Process Auditor."
3 Is that true?
4 A. No. I made no decision with Harriet's
5 employment or role or anything. That was her manager
6 and others, possibly.
7 Q. Did Donna Wilson ask for your opinion on
8 whether to keep Harriet employed?
9 A. No. She asked for that audit document you
10 showed me a few minutes ago. That's what I was asked to
11 do. And that, I believe, was asked by my manager, who
12 was Mark Shipley.
13 Q. Okay. Do you know anything about the
14 stand-alone position of Lead Internal Process Auditor?
15 A. Not sure what it means, no.
16 Q. Have you ever heard of that position before?
17 A. I never heard of any stand-alone position
18 titled "stand-alone."
19 Q. Okay. Did you ever make a recommendation that
20 auditing did not warrant an independent, full-time
21 position?
22 A. Again, the form that you put out, I showed it,
23 and in my opinion it did not warrant a full-time
24 position. I was asked and answered.
25 Q. Okay.

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1 MR. BAIL: Let's mark that as an exhibit.
2 (Exhibit 4 was marked.)
3 Q. (BY MR. BAIL) Can you please identify this
4 document in front of you for the record?
5 A. It's entitled "Internal Auditing."
6 Q. Did you prepare this document?
7 A. I did.
8 Q. Do you recall when you prepared this document?
9 A. Not exactly. Prior to the second layoff.
10 Q. Prior to the second layoff. Within a month or
11 two?
12 A. If you could remind me when the second layoff
13 was.
14 Q. September, October 2017.
15 A. I would say most likely within a month or two
16 of that time frame, yes.
17 Q. Okay. What did you mean by towards the bottom
18 part of this document, the last full paragraph, it says,
19 "Harriet's duties are only internal auditing." And then
20 you have in parentheses, "May want to mention that her
21 previous role was Process Improvement Specialist (I
22 believe) in the BE department, which is no longer a
23 department."
24 What is that all about?
25 A. That as far as I knew at the time, her only

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1 roles or duties were internal auditing, and I knew that
2 they were no longer IMS, and I did not know if her
3 previous role as process improvement was still existing.
4 I didn't believe it was because the BD department was
5 gone. So, basically, a statement.
6 Q. So you weren't really sure about that statement
7 factually?
8 A. No.
9 Q. Okay. Did you have any -- strike that.
10 Did you make the decision to give the IMS
11 duties to somebody other than Harriet?
12 A. After Harriet asked to have them removed and it
13 was agreed with her manager that it would be, then
14 ultimately it was given back to me to be responsible
15 for. I then decided to give it to Irene to do instead
16 of myself.
17 Q. Okay. Do you recall any other duties of
18 Harriet's that you were involved in giving to another
19 employee to do?
20 A. No.
21 Q. Your testimony is only the duties that were
22 given to Irene Manrique? The only duties of Harriet's
23 that you are aware given to anybody else by you is what
24 was given to Irene, right?
25 A. Other than on her FMLA, the auditing was given

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1 to the auditing team to do in her absence.
2 Q. During that period of time?
3 A. Yes.
4 Q. Okay. And this document was given to who?
5 A. I either gave it to Donna or to my boss Mark.
6 I can't recall which one. I think it was to Mark.
7 Q. Okay. And if we go to that short paragraph
8 right on top of the one I was just reading, it says, "On
9 staff at the Telge Road are four lead internal auditors:
10 Harriet Lane, William" --
11 A. Yes.
12 Q. -- "Kimberly Long, Lorraine Menezes, less one
13 leave 3, 2 coauditors - Andrea Lorea and Melissa
14 Shovelski?"
15 Was Kimberly Long an auditor at that time?
16 A. She was. I misspoke earlier and left her off
17 on one of your previous questions.
18 Q. Did you supervise her?
19 A. No, I did not.
20 Q. How would you describe your working
21 relationship with Kimberly Long?
22 A. Good.
23 Q. Did you have any disagreements with her?
24 A. I wouldn't say I had disagreements with anyone.
25 Q. Just for the record, did Melissa Shovelski ever

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<p>1 have any disagreements with you?</p> <p>2 A. May I speak?</p> <p>3 Q. Please.</p> <p>4 A. May I change your word? I have business</p> <p>5 disagreements, if that's what you are referring to.</p> <p>6 Yes, differences in opinions, of course.</p> <p>7 Q. Okay. Would that be the same for Kimberly</p> <p>8 Long, differences in opinion?</p> <p>9 A. It would probably be the same with everybody I</p> <p>10 have ever worked with.</p> <p>11 Q. For the record, are you testifying that there</p> <p>12 was no -- there wasn't any difference in the</p> <p>13 disagreements that you had with Kimberly Long and</p> <p>14 Melissa compared to disagreements with anybody else at</p> <p>15 work?</p> <p>16 A. I can't say they were the same differences in</p> <p>17 opinions, but I have differences in opinions through the</p> <p>18 course of doing business with most anyone from time to</p> <p>19 time. Whether they're the same or different, I wouldn't</p> <p>20 know.</p> <p>21 I'm trying to answer your question, but</p> <p>22 I'm not sure what you are asking me.</p> <p>23 Q. Have you ever been accused of discriminating</p> <p>24 against female coworkers?</p> <p>25 A. I believe Harriet has made that and was found</p>	<p>1 A. Good.</p> <p>2 Q. Did you have your own office, or did you work</p> <p>3 in a cubicle?</p> <p>4 A. Both. Depends on the time frame.</p> <p>5 Q. At the time period of my client's termination,</p> <p>6 September, October 2017.</p> <p>7 A. An office.</p> <p>8 Q. How close were you to Donna Wilson's office?</p> <p>9 A. About six down and over two.</p> <p>10 Q. Okay. That's pretty good.</p> <p>11 How often would you communicate with her</p> <p>12 on a daily level, approximately?</p> <p>13 A. Might talk once a day, twice a week. It just</p> <p>14 depends if we had anything to communicate about. Not</p> <p>15 often.</p> <p>16 Q. When you did speak to her, would you go to her</p> <p>17 office or ask her to come to your office?</p> <p>18 A. I don't recall. I imagine both.</p> <p>19 Q. Let's go back to this document. What do I have</p> <p>20 that one marked as?</p> <p>21 A. 3, I believe.</p> <p>22 Q. So back to Exhibit No. 3. If you go to the</p> <p>23 second-to-last paragraph, the paragraph right before the</p> <p>24 last line. And the last sentence says, "Four, Telge</p> <p>25 Road employees are currently trained to assist with</p>
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<p>1 to be unfounded. Other than that, I'm not aware of</p> <p>2 anyone.</p> <p>3 Q. But you were aware of Harriet's complaint</p> <p>4 about -- her allegations that you were a male chauvinist</p> <p>5 prior to her termination, correct?</p> <p>6 A. I don't recall ever hearing that word, no.</p> <p>7 Q. Okay. Did you know that she had issues with</p> <p>8 you in relation to your treatment of women prior to her</p> <p>9 being terminated?</p> <p>10 A. I knew of the points that we looked at in</p> <p>11 Exhibit No. 2 that were her complaints on me. But I</p> <p>12 wasn't aware of anything other than --</p> <p>13 Q. Other than what's in Exhibit No. 2?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. Have you ever placed an employee on a</p> <p>16 performance improvement plan?</p> <p>17 A. I have not.</p> <p>18 Q. You were aware -- strike that.</p> <p>19 Were you aware that Harriet was on a PIP?</p> <p>20 A. Not until yesterday.</p> <p>21 Q. Okay. Were you aware of any other employees</p> <p>22 being on a PIP in 2016 and 2017?</p> <p>23 A. Not that I recall, no.</p> <p>24 Q. How would you describe your working</p> <p>25 relationship with Donna Wilson?</p>	<p>1 audits. These" --</p> <p>2 A. I'm on the wrong document. Which one are we</p> <p>3 on? Where are we reading?</p> <p>4 Q. At the end, where my highlight is.</p> <p>5 A. Okay. I got you. Thank you.</p> <p>6 Q. "Four, Telge Road employees are currently</p> <p>7 trained to assist with audits. These trainees have</p> <p>8 taken on this responsibility in addition to their</p> <p>9 current workload. They are not part of Finance or</p> <p>10 Quality."</p> <p>11 Do you know anything about these</p> <p>12 employees?</p> <p>13 A. Yes. They're the audit team.</p> <p>14 Q. Okay.</p> <p>15 A. Audit team is a voluntary job.</p> <p>16 Q. It's collateral duty to what their main</p> <p>17 function is?</p> <p>18 A. Yes.</p> <p>19 Q. Do you know if these trainees volunteered or</p> <p>20 were they assigned?</p> <p>21 A. No. It's a volunteer job.</p> <p>22 Q. Do you know who they were?</p> <p>23 A. The ones that you have already written down.</p> <p>24 I'll try to remember them again, if you like. They were</p> <p>25 in Exhibit 4. So at the time there was Harriet Lane,</p>

10 (Pages 37 to 40)

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<p>1 myself, Kimberly Long, Lorraine Menezes. They were, I 2 believe, all lead auditors at the time. And then Andrew 3 Loera and Melissa Shovelski, they were both in training 4 to become lead auditors.</p> <p>5 Q. Okay. Do you know if the person training them 6 was Harriet?</p> <p>7 A. The training was -- whoever would be the lead 8 auditor, you would pair a trainee up with the lead 9 auditor. So it would have been any one of the four of 10 us.</p> <p>11 Q. What about Kathy DeGeorge? Was she also a 12 trainee?</p> <p>13 A. She signed up to be an auditor and then never 14 did any audits. So technically, yes, she was, but never 15 did any audits.</p> <p>16 Q. How would you classify your working 17 relationship with Kathy DeGeorge?</p> <p>18 A. I think it's good.</p> <p>19 Q. How long have you worked with her?</p> <p>20 A. Ever since she hired on. I don't know. I 21 guess she's been there four years or so.</p> <p>22 Q. Do you recall when Siemens took over the 23 business of Rolls-Royce in some fashion?</p> <p>24 A. I recall it but the time frame I don't. Might 25 have been nine years, eight years, six years. I don't</p>	<p>1 A. ISO 9001, ISO 14001, and OHSAS 18001 -- or I 2 got those two backwards -- it's a management scheme and 3 you become certified in those. So the three documents I 4 mentioned are standards that you are to follow, and then 5 you are audited by a notified body that you are 6 following the requirements of the standard. And you 7 receive a certificate.</p> <p>8 IMS stands for all three of them together, 9 where ISO 9001 certificate is a stand-alone certificate. 10 So Integrated Management System integrating quality, 11 health, safety and environmental creates an Integrated 12 Management System.</p> <p>13 Q. And you have to be certified to work with this?</p> <p>14 A. You don't have to be. It is what you -- a 15 company makes the decision to be, to present theirself 16 as an ISO-certified company or integrated management 17 system.</p> <p>18 Q. You testified earlier that according to you, my 19 client said she didn't want to do IMS responsibilities 20 anymore. Is that correct?</p> <p>21 A. The document control part of it, which was in 22 exhibit -- we don't have it. That part of it she did 23 not want to do anymore. I don't know any further duties 24 that she had within that IMS scheme.</p> <p>25 Q. Okay. Then did you have the authority to</p>
Page 42	Page 44
<p>1 recall. But it was a while back.</p> <p>2 Q. Okay. Do you recall discussing this Exhibit 4 3 with --</p> <p>4 A. No. 4? Yes.</p> <p>5 Q. Do you recall discussing this document with 6 Donna Wilson?</p> <p>7 A. It was either her or Mark Shipley. I don't 8 recall which one it was.</p> <p>9 Q. Was it over the phone or in person?</p> <p>10 A. It would have been in person.</p> <p>11 Q. Okay. Do you have this as No. 2?</p> <p>12 A. No. It's 4.</p> <p>13 Q. Which one do you have as No. 2? Thanks.</p> <p>14 MR. BAIL: Can I get like 10 minutes?</p> <p>15 MS. GRANT: Yeah.</p> <p>16 MR. BAIL: We're going off the record for 17 10 minutes.</p> <p>18 (A recess was taken.)</p> <p>19 Q. (BY MR. BAIL) You testified earlier about IMS 20 responsibilities. Correct?</p> <p>21 A. Correct.</p> <p>22 Q. What does "IMS" stand for?</p> <p>23 A. Integrate Management System.</p> <p>24 Q. I don't know anything about this. Explain to 25 me like a child what it is.</p>	<p>1 assign the duties that she allegedly didn't want to do 2 anymore to someone else?</p> <p>3 A. Once it was decided to follow that request, 4 they were then assigned back to me to have that taken 5 care of, do myself or however I deem necessary.</p> <p>6 Q. Okay. So you did have that discretion?</p> <p>7 A. Yes.</p> <p>8 Q. Who gave you that discretion to make that 9 decision?</p> <p>10 A. Mark Shipley.</p> <p>11 Q. Let's talk about Mark Shipley. How long have 12 you known Mark?</p> <p>13 A. Since he's been there.</p> <p>14 Q. How long has that been?</p> <p>15 A. I'm going to guess nine years maybe.</p> <p>16 Q. Do you have a friendship relationship with Mark 17 outside of the office?</p> <p>18 A. No.</p> <p>19 Q. Okay. Do you guys go out to lunch together?</p> <p>20 A. No.</p> <p>21 Q. Okay. Do you have any friendship relationships 22 with any employee outside of the office at Siemens?</p> <p>23 A. No.</p> <p>24 MR. BAIL: I pass the witness.</p> <p>25 MS. GRANT: I just have a couple of</p>

11 (Pages 41 to 44)

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1 follow-up questions.

2 EXAMINATION

3 BY MS. GRANT:

4 Q. With regard to Exhibit 2, which was your notes

5 and there's references to Harriet complaining about you

6 harassing her, although you knew that Ms. Lane

7 complained about you harassing her, did you know that

8 she complained specifically that you were harassing her

9 because of her race?

10 A. No.

11 Q. Did you know that she complained you were

12 harassing her specifically because she was a female?

13 A. No.

14 Q. You were asked some questions about the

15 auditing team, and you had testified earlier that the

16 auditing was a collateral duty for the members of the

17 audit team.

18 Do you recall that testimony?

19 A. Yes.

20 Q. Was auditing a collateral duty for Harriet?

21 A. Not to my knowledge. I believe that was one of

22 her main functions.

23 MS. GRANT: No further questions.

24 MR. BAIL: No further questions.

25 (The deposition concluded at 1:49 p.m.)

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1 CHANGES AND SIGNATURE

2 WITNESS NAME: WILLIAM MICHAEL PIATT

3 DATE OF DEPOSITION: FEBRUARY 4, 2020

4 PAGE LINE CHANGE REASON

5 _____

6 _____

7 _____

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25 JOB NUMBER: 18930

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1 I, WILLIAM MICHAEL PIATT, have read the foregoing

2 deposition and hereby affix my signature that same is

3 true and correct, except as noted above.

4

5 _____

6 WILLIAM MICHAEL PIATT

7

8 THE STATE OF _____)

9 COUNTY OF _____)

10

11 Before me, _____, on this day

12 personally appeared WILLIAM MICHAEL PIATT, known to me

13 (or proved to me under oath or through _____)

14 (description of identity card or other document)) to be

15 the person whose name is subscribed to the foregoing

16 instrument and acknowledged to me that they executed the

17 same for the purposes and consideration therein

18 expressed.

19 Given under my hand and seal of office this

20 ____ day of _____, 2020.

21

22 _____

23 NOTARY PUBLIC IN AND FOR

24 THE STATE OF _____

25 JOB NUMBER: 18930

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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE SOUTHERN DISTRICT OF TEXAS

3 HARRIET LANE, *

4 Plaintiff, *

5 v. * C.A. No. 4:19-cv-00435

6 SIEMENS ENERGY, INC., * JURY TRIAL DEMANDED

7 Defendant. *

8

9 REPORTER'S CERTIFICATION

10 ORAL DEPOSITION OF

11 WILLIAM MICHAEL PIATT

12 FEBRUARY 4, 2020

13 I, CONSTANCE KOENIG, RPR, Certified Shorthand

14 Reporter in and for the State of Texas, hereby certify

15 to the following:

16 That the witness, WILLIAM MICHAEL PIATT, was

17 duly sworn by the officer and that the transcript of the

18 deposition is a true record of the testimony given by

19 the witness;

20 That the original deposition was delivered to

21 Ashok Bail, Custodial Attorney.

22 That a copy of this certificate was served on

23 all parties shown herein on _____.

24 I further certify that pursuant to FRCP

25 Rule 30(f)(1) that the signature of the deponent:

____X____ was requested by the deponent or a party

before the completion of the deposition and that

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WILLIAM MICHAEL PIATT - 2/4/2020

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signature is to be returned within 30 days from the date of receipt of the transcript. If returned, the attached Changes and Signature Page contains any changes and the reasons therefore.

_____ was not requested by the deponent or party before the completion of the deposition.

I certify that I am neither attorney or counsel for, related to, nor employed by any of the parties or attorneys in the action in which this testimony was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Certified to by me this, the 10th day of February 2020.

CONSTANCE KOENIG, Texas CSR 6577

Expiration Date: 01-31-2021

Hanna & Hanna, Inc.

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